

EXHIBIT “3”

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CREEDON CONTROLS, INC., a
Delaware corporation,

Plaintiff,

v.

BANC ONE BUILDING CORPORATION, an
Illinois corporation; and FOREST ELECTRIC
CORPORATION, a New York corporation,

Defendants.

C.A. No. 05-300-JJF

**DEFENDANTS BANC ONE BUILDING CORPORATION'S AND
FOREST ELECTRIC CORPORATION'S ANSWERS TO
PLAINTIFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendants incorporate the general and specific objections and statements contained within their response to Plaintiff's First Request for Production of Documents.

ADDITIONAL GENERAL OBJECTIONS

1. Defendants object to the Request for Production of Documents to the extent that they call for the production of documents or information relating to Banc One Core Data Center I ("CDC I") and are outside the scope of Rule 26.
2. Defendants object to the Request for Production of Documents to the extent that they call for the production of documents or information relating to Tishman Construction, a non-party to this litigation and are not within defendants' possession or control.

REQUESTS

14. Identify and produce all photographs, videotapes, movies, or other audio or visual depictions of work at the Banc One Core Data Center in Wilmington, Delaware, and not limited to the scope of work performed by Plaintiff.

RESPONSE: Objection. This request is vague, overly broad and calls for production of documents beyond the scope of Rule 26 and outside the scope of this litigation. Without waiver of this objection and the general and specific objections, defendants will produce documents pertaining to Banc One Core Data Center II. See documents FE 000001-FE 008088, produced to Plaintiff on 9/20/05. Additional documents responsive to this request bearing Bates Nos. FE 008283-FE 008796 will be produced once a confidentiality order is executed.

15. All communications of any nature, including electronic communications, between either Defendant and Tishman Construction Corp., or any of its subsidiaries or affiliates, and which relate to the Project and/or the Banc One Core Data Center, in Wilmington, Delaware.

RESPONSE: Objection. This request is vague, overly broad and calls for production of documents beyond the scope of Rule 26 and outside the scope of this litigation. Without waiver of this objection and the general and specific objections, defendants will produce documents pertaining to Banc One Core Data Center II. See documents FE 00001-FE0008088, produced to Plaintiff on 9/20/05 and documents FE 008089-FE 008282, produced to Plaintiff on 10/12/05.

16. All communications of any nature whatsoever, including electronic communications, between any Defendant and any local, state, or governmental body or agency, with respect to the Project and/or the construction of the Banc One Core Data Center, in Wilmington, Delaware.

RESPONSE: Objection. This request is vague, overly broad and calls for production of documents beyond the scope of Rule 26 and outside the scope of this litigation. Without waiver of this objection and the general and specific objections, defendants will produce documents pertaining to Banc One Core Data Center II. See documents FE 00001-FE0008088, produced to Plaintiff on 9/20/05 and documents FE 008089-FE 008282, produced to Plaintiff on 10/12/05.

17. All other bids by other persons or entities to perform the same or similar scope of work as the bid(s) awarded to Plaintiff, with respect to the Project and/or the Banc One Core Data Center in Wilmington, Delaware.

RESPONSE: Objection. This request is vague, overly broad and calls for production of documents beyond the scope of Rule 26 and outside the scope of this litigation.

18. All other bids by other persons or entities to perform the same or similar scope of work as the bid(s) awarded to Plaintiff, with respect to the Project and/or the Banc One Core Data Center in Wilmington, Delaware.

RESPONSE: Objection. This request is vague, overly broad and calls for production of documents beyond the scope of Rule 26 and outside the scope of this litigation.

19. Any and all pleadings that relate to any litigation now or previously occurring between any Defendant and Tishman Construction Corp., or any of its subsidiaries or affiliates, and which relate to the Project and/or the Banc One Core Data Center, in Wilmington, Delaware.

RESPONSE: Objection. This request is vague, overly broad and calls for production of documents beyond the scope of Rule 26 and outside the scope of this litigation.

McCARTER & ENGLISH, LLP

By: /s/ Paul A. Bradley
Paul A. Bradley (DE Bar ID #2156)
James J. Freebery (DE Bar ID #3498)
919 North Market Street, Suite 1800
P.O. Box 111
Wilmington, DE 19899
(302) 984-6300

*Attorneys for Defendants
Banc One Building Corporation and
Forest Electric Corporation*

Dated: November 4, 2005

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BANC ONE BUILDING CORPORATION, an
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Defendants.

C.A. No. 05-300 (JJF)

NOTICE OF SERVICE

I hereby certify that on this 4th day of November, 2005, I caused Defendants' Responses to Plaintiff's Second Request for Production of Documents to be served by hand delivery upon:

Robert K. Beste, Jr., Esquire
Cohen Seglias Pallas
Greenhall & Furman, P.C.
Nemours Building, Suite 205
1007 Orange Street
Wilmington, DE 19801

MCCARTER & ENGLISH, LLP

By: /s/ Paul A. Bradley
Paul A. Bradley (DE Bar ID #2156)
James J. Freebery (DE Bar ID #3498)
919 N. Market Street, Suite 1800
P.O. Box 111
Wilmington, DE 19899
(302) 984-6333
Attorneys for Defendants